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Pisgah Forest, NC  
August 12, 2013  
email: bud1@citcom.net

Elizabeth Appel  
Office of Regulatory Affairs  
& Collaborative Actions  
U.S. Department of the Interior  
1849 C Street, NW  
MS 4141  
Washington, D.C. 20240

Dear Ms Appel:

In 1976, I was assigned to write the original regulations for federal acknowledgment of Indian tribes. A proposed draft was published in 1977 and became final as 25 C.F.R Part 83 in September 1978. I was subsequently chief of the Bureau of Indian Affairs' acknowledgment branch for ten years.

When I drafted the regulations, there were over 30 definitions of "Indian" There were no good guidelines and no one had any useful definitions. Thus the drafting was a matter of guesswork using advice by attorneys, lobbyists and other 'experts' who were for or against almost everything. The result was a conglomerate gaffe which created a circus of busywork within the bureau and among the petitioners - not at all what was intended. The year before I retired in 1988, we attempted within the branch to modify and simplify the existing regulations. The result changed little and did not go forward.

After I retired, another proposal was put forward and unfortunately was made final under the pretext of simplifying the process. It too was a miscarriage of common sense, did not simplify anything for the petitioners, but may have eased the workload for the branch.

The process badly needs reform and I wholeheartedly applaud the Administration for giving it another try.

Sincerely,



Bud Shapard